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WHOLE GRAINS COUNCIL

A CONSORTIUM OF INDUSTRY, SCIENTISTS, CHEFS AND OLDWAYS PRESERVATION TRUST
DEDICATED TO INCREASING CONSUMPTION OF WHOLE GRAINS FOR BETTER HEALTH
266 BEACON STREET • BOSTON, MA 02116

RECEIVED

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Honorable Tommy G. Thompson
Secretary of Health and Human Services
Washington, D.C.

November 24, 2004

OFFICE OF THE SECRETARY
COMMUNICATIONS CONTROL
CENTER

Honorable Ann M. Veneman
Secretary of Agriculture
Washington, D.C.

RE: FDA Docket 2004p-0223/CP 1

Dear Secretary Thompson and Secretary Veneman:

We thank you both for your dedication to improving the nation's health during your tenures as Secretaries, and we wish you well in your future activities.

We are writing to bring to your attention an important petition filed with the Food and Drug Administration, and to urge your prompt intervention to cause FDA to make the petition a priority.

The petition, filed by General Mills, Inc., seeks guidance from FDA on the use of various label claims concerning the whole grain content of foods. Prompt action by FDA will help consumers to truly take advantage of current dietary advice to increase consumption of whole grains. Without such action, the Federal government will have missed an opportunity to improve the health of Americans in many ways, especially with regard to obesity and overweight.

The Whole Grains Council is a group of concerned millers, food manufacturers, scientists, educators and chefs first convened by the Oldways Preservation Trust in June 2002 (Oldways is a nonprofit organization). The Council develops and executes programs:

- to reach consensus on the definition of "whole grains;"
- to educate consumers about the benefits of whole grains;
- to help consumers find, buy, and cook whole grains; and
- to help grain-product companies meet the needs of health-conscious consumers.

The benefits of whole grains are universally recognized within the health community.

For example:

- the Department of Health and Human Services in "Healthy People 2010" recommends increased consumption of whole grains.
- Similar recommendations have been made by the American Cancer Society, American Diabetes Association, American Dietetic Association, and the American Heart Association.
- The 2005 Dietary Guidelines Advisory Report states that "[c]onsuming at least three servings of whole grains per day can reduce the risk of diabetes and coronary heart disease and may help with weight maintenance."

These recommendations are based on the consensus science that whole grain consumption can reduce risk of cardiovascular disease, reduce risk of certain cancers, reduce risk for type 2 diabetes, and play a positive role in maintaining a healthy body weight and preventing future weight gain.

Unfortunately, consumption of whole grains remains well below current dietary recommendations despite this recognition of the many health benefits of whole grain consumption and the wide recognition of those benefits within the health community. The gap between recommended amounts of whole grain consumption and actual consumption will widen when, as expected, the revised Dietary Guidelines include an increase in the recommended amount of whole grain consumption from one serving a day to at least three servings per day.

FDA has before it a petition that would go a long way toward correcting the imbalance between recommendations to increase consumption of whole grains and the amount consumers actually are consuming. It

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does this by providing a clear and simple labeling tool to identify foods that contain significant quantities of whole grain.

It is widely recognized that consumers have no reliable and accessible way to identify foods that are good or excellent sources of whole grains. Without clear and consistent label statements that characterize the levels of whole grains in food, consumers will be left with recommendations to increase their consumption of whole grains without a simple tool to help them know how to do it. The petition before FDA will let consumers easily use the food label to put into action the whole grain Dietary Guideline, removing the confusion between "pyramid" servings/portions and FDA label servings.

If FDA does not act on the petition, the marketplace will remain chaotic as manufacturers label whole grain products without any standardization of whole grains claims, as occurred with "low carb" claims. This leaves consumers essentially fending for themselves, and the Federal government will have missed a straightforward, effective, and low cost way to enhance the health of American consumers.

Only rarely are there such wonderful opportunities to have a direct, immediate and non-controversial positive impact on the public health, especially when there is virtually no added public cost.


Providing consumers with the tools to increase consumption of whole grains is one of those opportunities, and it should not be missed.

Thank you both again for your efforts to improve the nation's health.

On behalf of the Whole Grains Council, very truly yours,



Mike Orlando
Sunnyland Mills
Chairman, Whole Grains Council



Jeff Dahlberg
National Grain Sorghum Producers
Vice-Chairman, Whole Grains Council



K. Dun Gifford
President
Oldways Preservation Trust

CC: Lester Crawford, DVM, Ph.D
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